

**REMARKS**

This paper is filed in response to the Office Action mailed October 19, 2006.

Following the amendments above, claims 1-46 are pending in this application. Claims 1-4, 12, 13, 15-18, 26, and 27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,724,571 to Woods (hereinafter "Woods") in view of U.S. Patent No. 6,685,475 to Maruyama et al (hereinafter "Maruyama"). Claims 5, 6, 19, 20, 30, and 31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of U.S. Patent Application Publication No. 2001/0049674 to Talib et al (hereinafter "Talib"). Claims 7 and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of U.S. Patent Application Publication No. 2002/0174101 to Fernley et al (hereinafter "Fernley"). Claims 8-11, 14, 22-25, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of Fernley and further in view of U.S. Patent No. 6,763,349 to Sacco (hereinafter "Sacco"). Claim 29 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of U.S. Patent Application Publication No. 2002/0022956 to Ukrainczyk et al (hereinafter "Ukrainczyk"). Claim 32 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of Talib and further in view of Fernley. Claim 33 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of Talib and further in view of Ukrainczyk. Claim 34 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of Talib and further in view of U.S. Patent No. 5,796,913 to Takada et al (hereinafter "Takada").

Applicant has amended claims 1, 3-7, 12-15, 17-21, 26-28, 30, and 31. Applicant has added new claims 35-46. No new matter is added by these amendments, and support for these amendments may be found in the specification and claims as originally filed.

Reconsideration and allowance of all claims is respectfully requested in light of the amendments above and the remarks below.

**I. Amendments to Claims 1 and 15**

Applicant has amended independent claims 1 and 15. Applicant has amended the claim to recite a target rule comprising “defining a concept comprising an origin concept, a distance, and a relationship, and defining a target scope,.” Support for this amendment may be found throughout the specification, such as in paragraph 25. Applicant has also amended claim 1 to recite an extraction rule comprising “defining an extraction scope.” Support for this amendment can be found throughout the specification, such as in paragraph 41.

Applicant respectfully asserts that, in light of the amendments above, all claims are in condition for allowance.

**II. Claims 1-4, 12, 13, 15-18, 26, and 27 – § 103(a) – Woods in view of Maruyama**

Applicant respectfully traverses the rejection of claims 1-4, 12, 13, 15-18, 26, and 27 under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama.

To sustain a rejection of a claim under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. *See* M.P.E.P. § 2143.03.

Because the combination of Woods and Maruyama does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship” as recited in amended claim 1, claim 1 is patentable over the combined references. Woods does not teach that defining a concept comprising an origin concept, a distance, and a relationship. Woods teaches searching a document for a term or group of terms, however, it does not teach a concept list comprising an origin concept, a distance, and a relationship. Embodiments of the present invention may search a target scope for an origin concept, the relationship between the origin concept and the evaluated concept (such as without limitation “is a kind of” or “is a part of”), and a distance between the origin concept and the evaluated concept (for example, without limitation, “single concept” or “unlimited”). For example, a search according to one embodiment of the present invention may have an origin concept of “dog,” a relationship of “is a kind of,” and a distance of “unlimited,” which may result in a search result comprising a list of any kind of dog described in the documents or articles searched. *See* Specification, paragraph 25. In contrast, Woods

describes the use of metrics, such as word order, missing terms, morphological variations, and other considerations. *See* Woods, Col. 6, line 17 to Col. 7, line 53. However, Woods does not teach or suggest “defining at least one target rules for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.”

Maruyama does not cure this deficiency. Maruyama does not teach or suggest “defining at least one target rules for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.” Maruyama does not teach an origin concept, a distance, or a relationship. Thus, the combination of Woods and Maruyama does not teach or suggest each and every element of claim 1. Claim 1 patentable over the combined references.

Like claim 1, amended claim 15 recites “defining at least one target rule for detection of target hits in an article, comprising: ...defining a target scope.” Claim 15 is patentable over the combined references for at least the same reasons as claim 1. Applicant respectfully requests the Examiner withdraw the rejections of claims 1 and 15.

Because claims 2-4, 12, 13, 16-18, 26, and 27 depend from and further limit claims 1 and 15, claims 2-4, 12, 13, 16-18, 26, and 27 are patentable over the combined references for at least the same reasons. Applicant respectfully requests the Examiner withdraw the rejection of claims 2-4, 12, 13, 16-18, 26, and 27.

### **III. Claims 5, 6, 19, 20, 30, and 31 – § 103(a) – Woods in view of Maruyama and Talib**

Applicant respectfully traverses the rejection of claims 5, 6, 19, 20, 30, and 31 under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of Talib.

To sustain a rejection of a claim under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. *See* M.P.E.P. § 2143.03.

Because the combined references do not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship” as recited in amended claims 1 and 15, from which claims 5, 6, 19, and 20 depend, claims 5, 6, 19, and 20 are patentable over the combined

references. As discussed above, Woods in view of Maruyama does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.” Talib does not cure this deficiency. Talib does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.” Thus, claims 5, 6, 19, and 20 are patentable over the combined references.

Similar to claim 1, claim 30 recites “defining target rules for detection of target hits in an article, comprising defining a target article region, a comparison method, and a target definition comprising a relationship, a distance, and at least one of a concept, a concept set, or a gist.” Claim 30 is patentable over the combined references for the same reason claim 1. Because claim 31 depends from and further limits claim 30, claim 31 is patentable over the combined references for at least the same reason.

Applicant respectfully requests the Examiner withdraw the rejection of claims 5, 6, 19, 20, 30, and 31.

#### **IV. Claims 7 and 21 – § 103(a) – Woods in view of Maruyama and Fernley**

Applicant respectfully traverses the rejection of claims 7 and 21 under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of Fernley.

To sustain a rejection of a claim under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. *See* M.P.E.P. § 2143.03.

Because the combined references do not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship” as recited in amended claims 1 and 15, from which claims 7 and 21 depend, claims 7 and 21 are patentable over the combined references. As discussed above, Woods in view of Maruyama does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: ...defining a target scope.” Fernley does not cure this deficiency. Fernley does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising

an origin concept, a distance, and a relationship.” Thus, claim 7 and 21 are patentable over the combined references.

Applicant respectfully requests the Examiner withdraw the rejection of claims 7 and 21.

**V. Claims 8-11, 14, 22-25, and 28 – § 103(a) – Woods in view of Maruyama, Fernley, and Sacco**

Applicant respectfully traverses the rejection of claims 8-11, 14, 22-25, and 28 under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama and further in view of Fernley and further in view of Sacco.

To sustain a rejection of a claim under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. *See* M.P.E.P. § 2143.03.

Because the combined references do not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship” as recited in amended claims 1 and 15, from which claims 8-11, 14, 22-25, and 28 depend, 8-11, 14, 22-25, and 28 are patentable over the combined references. As discussed above, the combination of Woods, Maruyama, and Fernley does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.” Sacco does not cure this deficiency. Sacco does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.” Thus, claims 8-11, 14, 22-25, and 28 are patentable over the combined references.

Applicant respectfully requests the Examiner withdraw the rejection of claims 8-11, 14, 22-25, and 28.

**VI. Claim 29 – § 103(a) – Woods in view of Maruyama and Ukrainczyk**

Applicant respectfully traverses the rejection of claim 29 under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama.

To sustain a rejection of a claim under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. *See* M.P.E.P. § 2143.03.

Because the combined references do not teach “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship” as recited in amended claim 15, from which claim 29 depends, claim 29 is patentable over the combined references. As discussed above, the combination of Woods and Maruyama does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.” Ukrainczyk does not cure this deficiency. Ukrainczyk does not teach “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.” Therefore, claim 29 is patentable over the combined references.

Applicant respectfully requests the Examiner withdraw the rejection of claim 29.

#### **VII. Claim 32 – § 103(a) – Woods in view of Maruyama, Talib, and Fernley**

Applicant respectfully traverses the rejection of claim 32 under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama.

To sustain a rejection of a claim under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. *See* M.P.E.P. § 2143.03.

Because the combined references do not teach or suggest “defining target rules for detection of target hits in an article, comprising defining a target article region, a comparison method, and a target definition comprising a relationship, a distance, and at least one of a concept, a concept set, or a gist” as recited in claim 30, from which claim 32 depends, claim 32 is patentable over the combined references. As discussed above, the combination of Woods, Maruyama, and Talib does not teach or suggest “defining target rules for detection of target hits in an article, comprising defining a target article region.” Fernley does not cure this deficiency. As discussed above, Fernley does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin

concept, a distance, and a relationship,” a limitation similar to the limitation found in claim 30, from which claim 32 depends. Therefore, claim 32 is patentable over the combined references.

Applicant respectfully requests the Examiner withdraw the rejection of claim 32.

**VIII. Claim 33 – § 103(a) – Woods in view of Maruyama, Talib, and Ukrainczyk**

Applicant respectfully traverses the rejection of claim 33 under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama.

To sustain a rejection of a claim under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. *See* M.P.E.P. § 2143.03.

Because the combined references do not teach or suggest “defining target rules for detection of target hits in an article, comprising defining a target article region, a comparison method, and a target definition comprising a relationship, a distance, and at least one of a concept, a concept set, or a gist” as recited in claim 30, from which claim 33 depends. As discussed above, the combination of Woods, Maruyama, and Talib does not teach or suggest “defining target rules for detection of target hits in an article, comprising defining a target article region, a comparison method, and a target definition comprising a relationship, a distance, and at least one of a concept, a concept set, or a gist.” Ukrainczyk does not cure this deficiency. As discussed above, Ukrainczyk does not teach “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship,” a limitation similar to the limitation found in claim 30. Therefore, claim 33 is patentable over the combined references.

Applicant respectfully requests the Examiner withdraw the rejection of claim 33.

**IX. Claim 34 – § 103(a) – Woods in view of Maruyama, Talib, and Takada**

Applicant respectfully traverses the rejection of claim 34 under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Maruyama.

To sustain a rejection of a claim under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. *See* M.P.E.P. § 2143.03.

Because the combined references do not teach or suggest “defining target rules for detection of target hits in an article, comprising defining a target article region, a comparison method, and a target definition comprising a relationship, a distance, and at least one of a concept, a concept set, or a gist” as recited in claim 30, from which claim 34 depends, claim 34 is patentable over the combined references. As discussed above, the combination of Woods, Maruyama, and Talib does not teach or suggest “defining target rules for detection of target hits in an article, comprising defining a target article region, a comparison method, and a target definition comprising a relationship, a distance, and at least one of a concept, a concept set, or a gist.” Takada does not cure this deficiency. Takada does not teach or suggest “defining at least one target rule for detection of target hits in an article, comprising: defining a concept list comprising an origin concept, a distance, and a relationship.” Thus, claim 34 is patentable over the combined references.

Applicant respectfully requests the Examiner withdraw the rejection of claim 34.

### CONCLUSION

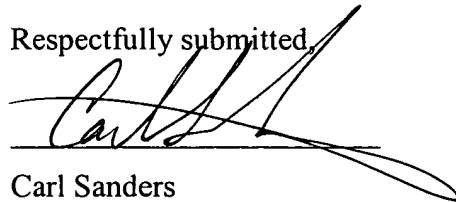
Applicant respectfully asserts that in view of the amendments and remarks above, all pending claims are allowable and Applicant respectfully requests the allowance of all claims.

Should the Examiner have any comments, questions, or suggestions of a nature necessary to expedite the prosecution of the application, or to place the case in condition for allowance, the Examiner is courteously requested to telephone the undersigned at the number listed below.

Date: December 19, 2006

KILPATRICK STOCKTON LLP  
1001 West Fourth Street  
Winston-Salem, NC 27101  
(336) 607-7474 (voice)  
(336) 734-2629 (fax)

Respectfully submitted,



Carl Sanders  
Reg. No. 57,203